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Attorney for Plaintiff  
CRISTINA MENDOZA

*\* Defendants and their respective counsel listed after the caption.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CRISTINA MENDOZA,

Plaintiff,

v.

CITY OF SAN JOSE, PACIFIC GAS &  
ELECTRIC COMPANY, a California  
registered domestic stock corporation,  
HUDSON SKYPORT PLAZA, LLC, a  
Delaware limited liability company,  
HUDSON SKYPORT PLAZA LAND,  
LLC, a Delaware limited liability company,  
HUDSON PACIFIC PROPERTIES, INC.,  
a Maryland corporation, SPIEKER  
PROPERTIES LP, a California limited  
partnership, EOP OPERTAING LIMITED  
PARTNERSHIP, LP, a Delaware limited  
partnership CA – SKYPORT I LIMITED  
PARTNERSHIP, a Delaware limited  
partnership; and DOES 1-100, Inclusive,

Defendants.

CASE NO. 5:17-cv-03579 SVK

Civil Rights

**STIPULATION TO FILE PLAINTIFF'S  
SECOND AMENDED COMPLAINT**

1 DAVID M. McLAUGHLIN (SBN 131973)  
2 SPIROS E FOUSEKIS (SBN 260387)  
3 ROPERS, MAJESKI, KOHN & BENTLEY  
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9 Attorneys for Defendants  
10 HUDSON SKYPORT PLAZA, LLC, a Delaware  
11 limited liability company, HUDSON SKYPORT  
12 PLAZA LAND, LLC, a Delaware limited liability  
13 company, HUDSON PACIFIC PROPERTIES, INC.,  
14 a Maryland corporation

### 15 STIPULATION

16 Plaintiff, CRISTINA MENDOZA (Plaintiff) and Defendants, HUDSON  
17 SKYPORT PLAZA, LLC, a Delaware limited liability company, HUDSON SKYPORT PLAZA  
18 LAND, LLC, a Delaware limited liability company, HUDSON PACIFIC PROPERTIES, INC., a  
19 Maryland corporation (HUDSON Defendants), hereby jointly stipulate and request through their  
20 attorneys of record the following:

21 WHEREAS, Plaintiff filed her First Amended Complaint on April 22, 2020 in accordance  
22 with this Court's order. Docket Nos. 82, 84;

23 WHEREAS, the deadline for Hudson Defendants to respond to the First Amended  
24 Complaint is May 6, 2020;

25 WHEREAS, the parties are negotiating in good faith to avoid the filing of a motion by the  
26 Hudson Defendants under F.R.C.P. Rule 12(b)(6) or, at the least, minimize the issues that would  
27 be brought before the Court under any such Motion;

28 WHEREAS, counsel for Plaintiff and Hudson Defendants have met and conferred and  
hereby stipulate to Plaintiff having leave to file a Second Amended Complaint.

NOW THEREFORE, Plaintiff and Hudson Defendants hereby STIPULATE as follows:

1 1. Plaintiff shall have leave to file her Second Amended Complaint within five (5) days  
2 of this Court's Order.

3  
4 **IT IS SO STIPULATED.**

5  
6 Dated: May 6, 2020,

DERBY, McGUINNESS & GOLDSMITH, LLP

7  
8 By: /s/ Anthony Goldsmith  
9 ANTHONY GOLDSMITH, ESQ.  
10 Attorneys for Plaintiff  
11 CRISTINA MENDOZA  
12

13 Dated: May 6, 2020,

ROPERS, MAJESKI, KOHN & BENTLEY

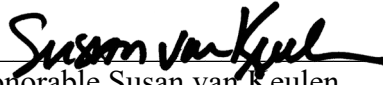
14  
15 By: /s/ David M. McLaughlin  
16 DAVID M. McLAUGHLIN  
17 SPIROS E FOUSEKIS  
18 DANIEL E. GAITAN  
19 Attorneys for Defendants  
20 HUDSON SKYPORT PLAZA, LLC, a  
21 Delaware limited liability company,  
22 HUDSON SKYPORT PLAZA LAND,  
23 LLC, a Delaware limited liability company,  
24 HUDSON PACIFIC PROPERTIES, INC.,  
25 a Maryland corporation  
26  
27  
28

**~~PROPOSED~~ ORDER**

For GOOD CAUSE SHOWN and for the reasons set forth above, Plaintiff shall have leave to file her Second Amended Complaint within five (5) days of this Order.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: May 8, 2020

  
\_\_\_\_\_  
Honorable Susan van Keulen  
United States Magistrate Judge